

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA

*

Plaintiff

*

v.

*

Criminal No: 3:15-cr-00319 RS

SHAUN W. BRIDGES

*

Defendant

*

* * * * *

MOTION FOR RELEASE OF PASSPORT

Comes Now Shaun W. Bridges, the above-named defendant, by and through undersigned counsel, and requests that this Honorable Court order the release of his passport to his legal representative at the time Mr. Bridges reports to his designated Bureau of Prisons facility, should this Honorable Court order confinement in this case. As grounds for this request, Mr. Bridges states as follows:

On or about April 1, 2015, Mr. Bridges surrendered his passport to the Pretrial Services Office in the Northern District of California;

On August 31, 2015, Mr. Bridges entered a guilty plea before this Honorable Court.

Mr. Bridges' sentencing date is December 7, 2015.

Pursuant to General Order #55 of the United States District Court for the Northern District of California, passports are forwarded to the Department of State upon a defendant's entry of a guilty plea, absent a court order to hold or return the passport;

WHEREFORE, for the foregoing reasons, Mr. Bridges respectfully requests this Honorable Court to order the Pretrial Services Office to hold Mr. Bridges' passport until such

time that Mr. Bridges is placed into custody, should this Honorable Court impose of a term of imprisonment in this case. At that time, Mr. Bridges requests that the passport be returned to his legal representative.

Alternatively, Mr. Bridges respectfully requests this Court to order the Pretrial Services Office not to forward the passport to the Department of State until this matter can be addressed at sentencing.

Respectfully submitted,

September 1, 2015

/s/

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Local Counsel for Mr. Bridges